

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**LARRY GOODMAN AND
TERRINIKA ST MARTIN**

VS.

**KRISTOFER NEWMAN
C.R. ENGLAND, INC. and
C.R. ENGLAND, TRUCKING, INC.**

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CIVIL NO. 1:22-cv-00232

DEFENDANT, C.R. ENGLAND'S NOTICE OF REMOVAL

**TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:**

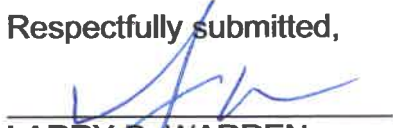
Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, **C.R. ENGLAND, INC.**, hereby removes this action to the United States District Court for the Western District of Texas Austin Division from the 98th District Court of Travis County, Texas, stating as follows:

1. Plaintiff, Larry Goodman, is a resident of Travis County and is a citizen of Texas.
2. Plaintiff, Terrinika St. Martin is a resident of Williamson County and is a citizen of Texas.
3. Plaintiffs commenced this action in the 98th District Court of Travis County, Texas, where it was given Cause No. D-1-GN-21-004678.
3. Defendant, C.R. England, Inc. is a Utah corporation organized under the law of the State of Utah. Its principal place of business is in the State of Utah. It is a citizen of Utah.
4. Defendant, Kristofer Newman is a resident of Olathe, Kansas and is a citizen of Kansas.

5. Plaintiffs and Defendants are citizens of different states, none of the Defendants are citizens of Texas, and the proper parties are totally diverse from Plaintiffs.
6. Defendant, C.R. England, Inc. received the summons and complaint on February 15, 2022.
7. Defendant, Kristofer Newman has not been served.
8. A copy of all process, pleadings, and orders known in this case are attached as Exhibit A.
9. Defendant, C.R. England will provide written notice of this Notice of Removal to all adverse parties and will file a copy with the Clerk of the 98th District Court of Travis County, Texas.
10. Defendant, Kristofer Newman consents to this removal.

Dated: **March 10, 2022**

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
FBN: 13339
**ATTORNEYS FOR DEFENDANT,
C.R. ENGLAND, INC.**

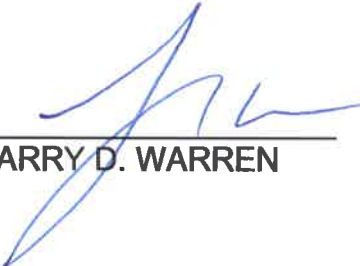
OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March 2022, the foregoing document, was filed with the Clerk of Court using the CM/ECF system, and was served on all counsel of record via E-mail:

Robert P. Wilson
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LARRY D. WARREN